



# State of Louisiana

## Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO  
GOVERNOR  
Certified Mail No.

MIKE D. McDANIEL, Ph.D.  
SECRETARY

Activity No.: PER19960002  
Agency Interest No. 3732

Fred A. Elliot  
Plant Manager  
PCS Nitrogen Fertilizer, LP  
P.O. Box 307  
Geismar, Louisiana 70734

RE: Part 70 Operating Permit, Sulfuric Acid Plant, a portion of the Geismar Agricultural Nitrogen & Phosphate Plant  
PCS Nitrogen Fertilizer LP, Geismar, Ascension and Iberville Parishes, Louisiana

Dear Mr. Elliot:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2011, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until the permitting authority takes final action on the application for permit renewal. Agency interest number cited above should be referenced in future correspondence.

Done this \_\_\_\_\_, 2006.

Permit No.: 22

Sincerely,

Chuck Carr Brown Ph.D.  
Assistant Secretary  
CCB:KCW  
cc: EPA Region VI

OFFICE OF ENVIRONMENTAL SERVICES • P.O. BOX 4313 • BATON ROUGE, LOUISIANA 70821-4313



AN EQUAL OPPORTUNITY EMPLOYER



**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PCS Nitrogen Fertilizer LP – Sulfuric Acid Plant - Geismar Agricultural Nitrogen & Phosphate Plant**  
**Agency Interest No.: 3732**  
**PCS Nitrogen Fertilizer LP**  
**Geismar, Ascension and Iberville Parishes, Louisiana**

**I. Background**

PCS Nitrogen Fertilizer LP, Sulfuric Acid Plant at the Geismar Agricultural Nitrogen & Phosphate Plant, an existing fertilizer facility began operation in 1967 as Allied Chemical Corporation. Permit 924T was issued on May 18, 1978 to allow the installation of a 3,800 ton storage tank for 93% sulfuric acid. The sulfuric acid drying and absorption tower were replaced in kind by the original manufacturer in 1981 as an emission reduction project. An upgraded mist eliminator was installed to replace the existing mist eliminator. Permit 0180-00046-01 was issued on November 17, 1990 authorizing the construction of a Chlorosulfonic Acid Plant. The permit was administratively amended on July 16, 1991. The permit number was later revised to Permit No. 2239. The PCS Nitrogen Fertilizer LP – Sulfuric Acid Plant currently operates under Permit No. 2247, issued January 31, 1994. The current permit incorporated the Chlorosulfonic Acid Plant previously permitted under Permit No. 2239 and the previously grandfathered Sulfuric Acid Plant. The Chlorosulfonic Acid Plant was separated when Permit No. 2537 was issued on May 1, 1998 to the new owner Gabriel Chemicals, LLC. The Chlorosulfonic Acid Plant was issued Title V Permit No. 0180-00076-V0 on October 14, 2002 to Gabriel Chemicals, LLC when PCS Nitrogen became the operator of the Chlorosulfonic Acid Plant. A new cooling tower was authorized under Permit No. 2592 issued February 4, 1999.

This is the Part 70 operating permit for the Sulfuric Acid Plant.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by Arcadian Fertilizer, L.P. on October 15, 1996 requesting a Part 70 operating permit. A permit reconciliation application was submitted on June 28, 2001. Additional information dated August 26, 2005, October 4, & 27, 2005, November 3, 2005 and December 16, 2005 was also received.

**III. Description**

The sulfuric acid plant is a conventional contact, single absorption unit of Monsanto design that was built during the 1960's. The main reactor is equipped with natural gas combustors that are utilized to "Start-up" the reactor until the normal process is sustainable. Molten sulfur is atomized in a dry-air sulfur burner to produce SO<sub>2</sub>. SO<sub>2</sub> is converted to SO<sub>3</sub> in a four-pass catalytic converter. The heat of oxidation is captured in two waste heat boilers and an economizer. The SO<sub>3</sub> stream is passed through and absorbed in 98% sulfuric acid in an absorbing tower to produce concentrated sulfuric acid product. Some of the SO<sub>3</sub> goes to an oleum tower. Vapors from the oleum tower are returned to the absorbing tower. There is only

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one vent stack from the sulfuric acid production unit, which is equipped with a mist eliminator that acts primarily as a process design to retain the sulfuric acid product and in a secondary function to minimize emissions.

PCS Nitrogen Fertilizer LP is not modifying the plant, but is incorporating the previously unpermitted auxiliary equipment that consists of molten sulfur storage tanks and pits, sulfuric acid and oleum storage tanks, a cooling tower, and ship, barge, rail car and truck loading facilities. The increase of sulfur dioxide and sulfuric acid emissions is almost totally due to a reconciliation of the emission rates, based upon the most current stack testing of the sulfuric acid production unit.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	<0.01	5.89	+5.89
SO <sub>2</sub>	8970.6	10,157.38	+1,186.78
NO <sub>x</sub>	55.01	65.96	+10.95
CO	0.05	3.65	+3.60
VOC	<0.01	0.90	+0.90
SO <sub>3</sub> (Sulfur Trioxide)	<0.01	4.86	+4.86
HCl (Hydrochloric Acid)*	<0.01	-	+<0.01
CLSO <sub>2</sub> OH (Chlorosulfonic Acid)	<0.01	-	-<0.01
H <sub>2</sub> SO <sub>4</sub> (Sulfuric Acid)*	<0.01	40.84	+40.84
Ammonia*	Not Reported	<0.01	+<0.01
Chlorine*	Not Reported	0.015	+0.015
Hydrogen Sulfide*	Not Reported	4.27	+4.27
Total Fluorides * (surrogate for Hydrogen Fluoride)	Not Reported	<0.01	-

\*Non - VOC LAC 33:III Chapter 51 Class III - Toxic Air Pollutants (TAPs):

#### **IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70, and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

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**Agency Interest No.: 3732**  
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**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 2005; and in the <local paper>, <local town>, on <date>, 2005. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Dispersion Model(s) Used: ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
SO <sub>2</sub>	Annual	13.83 µg/m <sup>3</sup>	80 µg/m <sup>3</sup>
SO <sub>2</sub>	24-hour avg.	250.72 µg/m <sup>3</sup>	365 µg/m <sup>3</sup>
SO <sub>2</sub>	3-hour avg.	737.48 µg/m <sup>3</sup>	1300 µg/m <sup>3</sup>
H <sub>2</sub> SO <sub>4</sub>	8-hour avg.	16.9 µg/m <sup>3</sup>	23.80 µg/m <sup>3</sup>

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**VIII. General Condition XVII Activities**

Work Activity	Schedule	PM <sub>10</sub>	Emission Rates - lbs			
			SO <sub>2</sub>	NO <sub>X</sub>	CO	VOC
SSA-GC-1 Catalyst Screening	6 months	98				

**IX. Insignificant Activities**

ID No.:	Description	Citation
SSA-IS-3	Oil Condensate Drum, 2,500 gallons	LAC 33:III.501.B.5.A.3.
SSA-IS-4	DAP Fugitive Dust Oil Storage, 8,000 gallons	LAC 33:III.501.B.5.A.3.
SSA-IS-12	Lube Oil Reservoir, 90 gallons	LAC 33:III.501.B.5.A.3.
SSA-IS-1	Caustic Storage # 1, 17,000 gallons	LAC 33:III.501.B.5.A.10.
SSA-IS-2	Caustic Storage # 2, 6,000 gallons	LAC 33:III.501.B.5.A.10.
SSA-IS-5	Cooling Water Deposit Control and Corrosion Inhibitor Tank # 1, 500 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-6	Cooling Water Deposit Control and Corrosion Inhibitor Tank # 2, 500 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-7	Bleach Tank, 1,000 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-8	Sulfuric Acid Tank, 250 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-9	Neutralizing Amine Tank, 1000 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-10	Oxygen Scavenger Tank, 2,000 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-11	Boiler Internal Treatment Tank, 1,000 gallons	LAC 33:III.501.B.5.B.8.
SSA-IS-13	Soft Water Storage	LAC 33:III.501.B.5.C.1.
SSA-IS-14	Brine Tank	LAC 33:III.501.B.5.C.1.
SSA-IS-15	Lixator Tank # 1	LAC 33:III.501.B.5.C.1.
SSA-IS-16	Lixator Tank # 1	LAC 33:III.501.B.5.C.1.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

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**Geismar, Ascension and Iberville Parishes, Louisiana**

**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.: Description	LAC 33:III Chapter																	
	5*	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	22	29*	51*	53	56	59
GRP 22 Sulfuric Acid Plant (A portion of the entire facility)		1	1	1						1					1	1	1	1
ARE 5 SSA-24 - Miller's Pond																		1
EQT 40 SSA-1 - Sulfuric Acid Plant Vent Stack																		3
EQT 41 SSA-10 - East Low Iron Tank																		1
EQT 42 SSA-11 - West Low Iron Tank																		1
EQT 43 SSA-12 - Start-up Acid Tank																		1
EQT 44 SSA-13 - Dilution Pump Tank																		1
EQT 45 SSA-14 - Oleum #1																		1
EQT 46 SSA-15 - Oleum #2																		1
EQT 47 SSA-16 - Molten Sulfur Tank																		1
EQT 48 SSA-17 - Molten Sulfur Day Tank																		1
EQT 49 SSA-18 - Molten Sulfur Pit, Feed																		1
EQT 50 SSA-19 - Molten Sulfur Pit and Truck Unloading																		1
EQT 51 SSA-20 - Truck Unloading																		1
EQT 52 SSA-21 - Rail Unloading																		1
EQT 53 SSA-22 - Temporary Diesel Air Compressor																		
EQT 54 SSA-23 - Salt Unloading																		

## LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

### PCS Nitrogen Fertilizer LP - Sulfuric Acid Plant - Geismar Agricultural Nitrogen & Phosphate Plant

Agency Interest No.: 3732  
PCS Nitrogen Fertilizer LP

#### Geismar, Ascension and Iberville Parishes, Louisiana

X. **Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	LAC 33:III.Chapter																	
		5*	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	22	29*	51*	53	56	59
EQT 55	SSA-3 - Sulfuric Acid Cooling Tower																		
EQT 56	SSA-4 - Sulfuric Acid Storage Tank #1																		1
EQT 57	SSA-5 - Sulfuric Acid Storage Tank #2																		1
EQT 58	SSA-6 - Sulfuric Acid Storage Tank #3																		1
EQT 59	SSA-7 - Sulfuric Acid Storage Tank #4																		1
EQT 60	SSA-8 - Sulfuric Acid Storage Tank #5																		1
EQT 61	SSA-9 - 98% Pump Tank																		1
FUG 8	SSA-2 - Sulfuric Acid Plant Fugitives																		1
GRP 23	Sulfuric Acid Plant Normal Operations																		1
GRP 24	Sulfuric Acid Plant Startups																		1

\* The regulations indicated above are State Only regulations except for LAC 33:III.501.C.6 Limitations that specifically state that the regulation is Federally Enforceable.

#### KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
  - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
  - Blank – The regulations clearly do not apply to this type of emission source.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PCS Nitrogen Fertilizer LP - Sulfuric Acid Plant - Geismar Agricultural Nitrogen & Phosphate Plant**  
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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR						
		K	Ka	Kb	Db	Dc	H	KKK	A	J	V	A	Q	SS	VV	HHH	64	68	68	82						
GRP 22	Sulfuric Acid Plant																									
ARE 5	SSA-24 - Miller's Pond																									
EQT 40	SSA-1 - Sulfuric Acid Plant Vent Stack																									
EQT 41	SSA-10 - East Low Iron Tank																									
EQT 42	SSA-11 - West Low Iron Tank																									
EQT 43	SSA-12 - Start-up Acid Tank																									
EQT 44	SSA-13 - Dilution Pump Tank																									
EQT 45	SSA-14 - Oleum #1																									
EQT 46	SSA-15 - Oleum #2																									
EQT 47	SSA-16 - Molten Sulfur Tank																									
EQT 48	SSA-17 - Molten Sulfur Day Tank																									
EQT 49	SSA-18 - Molten Sulfur Pit, Feed																									
EQT 50	SSA-19 - Molten Sulfur Pit and Truck Unloading																									
EQT 51	SSA-20 - Truck Unloading																									
EQT 52	SSA-21 - Rail Unloading																									
EQT 53	SSA-22 - Temporary Diesel Air Compressor																									
EQT 54	SSA-23 - Salt Unloading																									
EQT 55	SSA-3 - Sulfuric Acid Cooling Tower																									

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61			40 CFR 63 NESHAP			40 CFR				
		K	Ka	Kb	Db	Dc	H	KKK	A	J	V	A	Q	SS	VV	HHH	64	68
EQT 56	SSA-4 - Sulfuric Acid Storage Tank #1																	
EQT 57	SSA-5 - Sulfuric Acid Storage Tank #2																	
EQT 58	SSA-6 - Sulfuric Acid Storage Tank #3																	
EQT 59	SSA-7 - Sulfuric Acid Storage Tank #4																	
EQT 60	SSA-8 - Sulfuric Acid Storage Tank #5																	
EQT 61	SSA-9 - 98% Pump Tank																	
FUG 8	SSA-2 - Sulfuric Acid Plant Fugitives																	
GRP 23	Sulfuric Acid Plant Normal Operations																	
GRP 24	Sulfuric Acid Plant Startups																	

**KEY TO MATRIX**

- 1 -The regulations have applicable requirements that apply to this particular emission source.  
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
GRP 22 Sulfuric Acid Plant and EQT 40 SSA-1 - Sulfuric Acid Plant Vent Stack	Compliance Assurance Monitoring (CAM) [40 CFR 64]	EXEMPT. 40 CFR 64.5 Deadlines for Submittals allows the facility to submit the CAM plan at the first renewal of the Part 70 Operating permit. Therefore, the facility does not need to comply with the CAM regulations until the first renewal.
ARE 5 SSA-24 - Miller's Pond	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III. Chapter 51]	EXEMPT. The pond contains hydrogen fluoride and ammonia, which are a Class III TAP. These pollutants are not subject to MACT control. Emissions must be included in the annual TEDI submittal.
EQT 40 SSA-1 - Sulfuric Acid Plant Vent Stack	NSPS Subpart H – Standards of Performance for Sulfuric Acid Plants [40 CFR 60.80(b)]	DOES NOT APPLY. Facility was built before August 17, 1971 and has not been modified in accordance with the definition of modification in 40 CFR 60.2
EQT 40 SSA-1 - Sulfuric Acid Plant Vent Stack GRP 23 and GRP 24 – Alternate operating Scenarios for the Sulfuric Acid Train.	Emission Standards for Sulfur Dioxide Recordkeeping and Reporting [LAC 33:III.1503.A] Emission Standards for Sulfur Dioxide Exceptions [LAC 33:III.1507.A.1] Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A]	DOES APPLY. During normal operations, (GRP 23) the Sulfuric Acid Train is subject to LAC 33:III.1503.A, 1503.D.1, 1511.A and 1513.A. EXEMPT. During Startup conditions, (GRP 24) the facility is allowed the exemption under LAC 33:III.1507.A
EQT 40 SSA-1 - Sulfuric Acid Plant Vent Stack GRP 23 and GRP 24 – Alternate operating Scenarios for the Sulfuric Acid Train.	Fuel Burning Equipment [LAC 33:III.1313.C]	DOES NOT APPLY. During normal operations, (GRP 23) the Sulfuric Acid Train is not subject to LAC 33:III.1313.C as products of combustion do have direct contact with the process materials. DOES APPLY. During Startup conditions, (GRP 24) the equipment combusts natural gas prior to initializing normal operations.

## LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**PCS Nitrogen Fertilizer LP - Sulfuric Acid Plant - Geismar Agricultural Nitrogen & Phosphate Plant**  
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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes			
EQT 40 SSA-1 - Sulfuric Acid Plant Vent Stack GRP 23 and GRP 24 – Alternate operating Scenarios for the Sulfuric Acid Train.	Control of Emissions of Nitrogen Oxides (NO <sub>x</sub> ) [LAC 33:III.2201.A]	DOES NOT APPLY. During normal operations, (EQT 40 and GRP 23) the Sulfuric Acid Train combusts Sulfur. The ignition temperature of Sulfur does not support the generation of Thermal NO <sub>x</sub> .  EXEMPT. During Startup conditions, (GRP 24) the equipment combusts natural gas prior to initializing normal operations, which is exempt per LAC 33:III.2201.C.9.			
EQT 41 – 52, 56 – 61 Sulfuric acid storage tanks, and molten sulfur storage and unloading sources	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III. Chapter 51]	EXEMPT. Storage tanks store sulfuric acid, which is a Class III TAP. Molten sulfur emits hydrogen sulfide, which is a Class III TAP. These pollutants are not subject to MACT control. Emissions must be included in the annual TEDI submittal.			
FUG 8 SSA-2 - Sulfuric Acid Plant Fugitives	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III. Chapter 51]	EXEMPT. Sulfuric acid and hydrogen sulfide are Class III TAPs. These pollutants are not subject to MACT control. Emissions must be included in the annual TEDI submittal.			
EQT 53 SSA-22 - Temporary Diesel Air Compressor	Emission Standards for Sulfur Dioxide Recordkeeping and Reporting [LAC 33:III.1503.C] Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A]	EXEMPT. Unit emits less than 250 tons of SO <sub>2</sub> per year and is exempt from LAC 33:III.1503.C. Unit emits less than 100 tpy and is exempt from continuous monitoring. Record and retain at the site for at least 2 years the data required to demonstrate exemption from SO <sub>2</sub> standards of Chapter 15.			
EQT 55 SSA-3 - Sulfuric Acid Cooling Tower	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers [40 CFR 63, Subpart Q]	DOES NOT APPLY. The facility does not use chromium based water treatment chemicals			

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

## 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
  1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

## 40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.  
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of

## 40 CFR PART 70 GENERAL CONDITIONS

attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
  - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  - 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
  - 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;

## 40 CFR PART 70 GENERAL CONDITIONS

5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

## 40 CFR PART 70 GENERAL CONDITIONS

- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT**  
**GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated October 15, 1996. A permit reconciliation application was submitted on June 28, 2001. Additional information dated August 26, 2005, October 4, 2005, October 27, 2005, November 3, 2005 and December 16, 2005 was also received.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.  
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
  - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June

**LOUISIANA AIR EMISSION PERMIT**  
**GENERAL CONDITIONS**

3. Report by December 31 to cover July through September
4. Report by March 31 to cover October through December

D. Each report submitted in accordance with this condition shall contain the following information:

1. Description of noncomplying emission(s);
2. Cause of noncompliance;
3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.

E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

## INVENTORIES

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant  
Activity Number: PER19960002  
Permit Number: 2247-V0

Air - Title V Regular Permit Initial

Subject Item Inventory	ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
ARE005	SSA-24 - Miller's Pond			3.67 MM gallons/day (anticipated flow)	1650 tons/day	expressed as 100% H <sub>2</sub> SO <sub>4</sub>	8760 hr/yr (All Year)
EQT040	SSA-1 - Sulfuric Acid Plant Vent Stack		532866 gallons	1720 tons/day	652981 gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT041	SSA-10 - East Low Iron Tank		532866 gallons	1.31 MM gallons/yr	652981 gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT042	SSA-11 - West Low Iron Tank		13135 gallons	313431 gallons/yr	261192 gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT043	SSA-12 - Start-up Acid Tank		4072 gallons	1.67 MM gallons/yr	1.39 MM gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT044	SSA-13 - Dilution Pump Tank		133076 gallons	28.7 MM gallons/yr	1.31 MM gallons/yr	Oleum (Fuming Sulfuric Acid)	8760 hr/yr (All Year)
EQT045	SSA-14 - Oleum #1		288879 gallons	28.7 MM gallons/yr	1.31 MM gallons/yr	Oleum (Fuming Sulfuric Acid)	8760 hr/yr (All Year)
EQT046	SSA-15 - Oleum #2		2.42 million gallons	121.95 MM gallons/yr	26.73 MM gallons/yr	Molten Sulfur	8760 hr/yr (All Year)
EQT047	SSA-16 - Molten Sulfur Tank		84554 gallons	1982.16 MM gallons/yr	26.73 MM gallons/yr	Molten Sulfur	8760 hr/yr (All Year)
EQT048	SSA-17 - Molten Sulfur Day Tank		2670 gallons	345.6 MM gallons/yr	26.73 MM gallons/yr	Molten Sulfur	8760 hr/yr (All Year)
EQT049	SSA-18 - Molten Sulfur Pit, Feed		7350 gallons	1.95 MM gallons/yr	26.73 MM gallons/yr	Molten Sulfur	8760 hr/yr (All Year)
EQT050	SSA-19 - Molten Sulfur Pit and Truck Unloading			15.07 MM gallons/yr	1.95 MM gallons/yr	1.73 MM gpy 93% & 220 M gpy	500 hr/yr (All Year)
EQT051	SSA-20 - Truck Unloading					99% Sulfuric Acid	2000 hr/yr (All Year)
EQT052	SSA-21 - Rail Unloading					99% Sulfuric Acid	1344 hr/yr (All Year)
EQT053	SSA-22 - Temporary Diesel Air Compressor			475 horsepower	840 tons/yr	Common NaCl Salt	35 hr/yr (All Year)
EQT054	SSA-23 - Salt Unloading					Circulation Water with Bleach	8760 hr/yr (All Year)
EQT055	SSA-3 - Sulfuric Acid Cooling Tower				11000 gallons/min	(Sodium Hypochlorite)	
EQT056	SSA-4 - Sulfuric Acid Storage Tank #1		532866 gallons	75.51 MM gallons/yr	28.31 MM gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT057	SSA-5 - Sulfuric Acid Storage Tank #2		532866 gallons	75.51 MM gallons/yr	28.31 MM gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT058	SSA-6 - Sulfuric Acid Storage Tank #3		532866 gallons	17.8 MM gallons/yr	2.22 MM gallons/yr	93% Sulfuric Acid	8760 hr/yr (All Year)
EQT059	SSA-7 - Sulfuric Acid Storage Tank #4		532866 gallons	94.38 MM gallons/yr	37.75 MM gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT060	SSA-8 - Sulfuric Acid Storage Tank #5		532866 gallons	94.38 MM gallons/yr	37.75 MM gallons/yr	99% Sulfuric Acid	8760 hr/yr (All Year)
EQT061	SSA-9 - 98% Pump Tank		44956 gallons	4079.5 MM gallons/yr	3399.58 MM gallons/yr	98% Sulfuric Acid	8760 hr/yr (All Year)
FUG008	SSA-2 - Sulfuric Acid Plant Fugitives						

### Subject Item Groups:

ID	Description
GRP022	Sulfuric Acid Plant

### Included Components (from Above)

ARE5 SSA-24 - Miller's Pond
EQT40 SSA-1 - Sulfuric Acid Plant Vent Stack
EQT41 SSA-10 - East Low Iron Tank
EQT42 SSA-11 - West Low Iron Tank
EQT43 SSA-12 - Start-up Acid Tank
EQT44 SSA-13 - Dilution Pump Tank
EQT45 SSA-14 - Oleum #1

## INVENTORIES

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant  
 Activity Number: PER19960002  
 Permit Number: 2247-V0  
 Air - Title V Regular Permit Initial

### Subject Item Groups:

ID	Description	Included Components (from Above)
GRP022	Sulfuric Acid Plant	
GRP022	Sulfuric Acid Plant	EQT46 SSA-15 - Oleum #2
GRP022	Sulfuric Acid Plant	EQT47 SSA-16 - Molten Sulfur Tank
GRP022	Sulfuric Acid Plant	EQT48 SSA-17 - Molten Sulfur Day Tank
GRP022	Sulfuric Acid Plant	EQT49 SSA-18 - Molten Sulfur Pit, Feed
GRP022	Sulfuric Acid Plant	EQT50 SSA-19 - Molten Sulfur Pit and Truck Unloading
GRP022	Sulfuric Acid Plant	EQT51 SSA-20 - Truck Unloading
GRP022	Sulfuric Acid Plant	EQT52 SSA-21 - Rail Unloading
GRP022	Sulfuric Acid Plant	EQT53 SSA-22 - Temporary Diesel Air Compressor
GRP022	Sulfuric Acid Plant	EQT54 SSA-23 - Salt Unloading
GRP022	Sulfuric Acid Plant	EQT55 SSA-3 - Sulfuric Acid Cooling Tower
GRP022	Sulfuric Acid Plant	EQT56 SSA-4 - Sulfuric Acid Storage Tank #1
GRP022	Sulfuric Acid Plant	EQT57 SSA-5 - Sulfuric Acid Storage Tank #2
GRP022	Sulfuric Acid Plant	EQT58 SSA-6 - Sulfuric Acid Storage Tank #3
GRP022	Sulfuric Acid Plant	EQT59 SSA-7 - Sulfuric Acid Storage Tank #4
GRP022	Sulfuric Acid Plant	EQT60 SSA-8 - Sulfuric Acid Storage Tank #5
GRP022	Sulfuric Acid Plant	EQT61 SSA-9 - 98% Pump Tank
GRP022	Sulfuric Acid Plant	FUG8 SSA-2 - Sulfuric Acid Plant Fugitives
GRP023	Sulfuric Acid Plant Normal Operation	EQT40 SSA-1 - Sulfuric Acid Plant Vent Stack
GRP024	Sulfuric Acid Plant Startups	EQT40 SSA-1 - Sulfuric Acid Plant Vent Stack

### Relationships:

Subject Item	Relationship	Subject Item
GRP23 Sulfuric Acid Plant Normal Operation	Vents to	EQT40 SSA-1 - Sulfuric Acid Plant Vent Stack
GRP24 Sulfuric Acid Plant Startups	Vents to	EQT40 SSA-1 - Sulfuric Acid Plant Vent Stack

### Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
ARE005	55.4	124500	7.5	116	77	200
EQT040	SSA-24 - Miller's Pond					180
EQT041	SSA-1 - Sulfuric Acid Plant Vent Stack					30
EQT042	SSA-10 - East Low Iron Tank					30
EQT043	SSA-11 - West Low Iron Tank					30
EQT044	SSA-12 - Start-up Acid Tank					70
EQT045	SSA-13 - Dilution Pump Tank					6.6
EQT046	SSA-14 - Oleum #1					18.5
EQT047	SSA-15 - Oleum #2					70
EQT048	SSA-16 - Molten Sulfur Tank					42
EQT049	SSA-17 - Molten Sulfur Day Tank					25
	SSA-18 - Molten Sulfur Pit, Feed					0

## INVENTORIES

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant  
 Activity Number: PER19960002  
 Permit Number: 2247-V0  
 Air - Title V Regular Permit Initial

Stack Information:		Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
ID	Description						
EQT050	SSA-19 - Molten Sulfur Pit and Truck Unloading						
EQT051	SSA-20 - Truck Unloading						
EQT052	SSA-21 - Rail Unloading						
EQT055	SSA-3 - Sulfuric Acid Cooling Tower						
EQT061	SSA-9 - 98% Pump Tank						
GRP023	Sulfuric Acid Plant Normal Operation	58.9	124500	7.5	56.25	12.25	185
GRP024	Sulfuric Acid Plant Startups			7.5	56.25	200	180
						200	200

## Fee Information:

Sub Item Id	Multipplier	Units Of Measure	Fee Desc
GRP022	1650	Ton/Day	0540 - Sulphuric Acid Manufacture (Rated Capacity)

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant  
 Activity Number: PER19960002  
 Permit Number: 2247-V0

Ar - Title V Regular Permit Initial  
 Ar - Title V Regular Permit Initial

### All phases

Subject Item	PM <sub>10</sub>		SO <sub>2</sub>		NOX		CO		VOC	
	Avg lb hr	Max lb hr	Avg lb hr	Max lb hr	Avg lb hr	Max lb hr	Avg lb hr	Max lb hr	Avg lb hr	Max lb hr
EQT 040 SSA-1	0.69	0.83	< 0.07	2318.06	2772.33	< 0.153	10	12.59	14.95	55.15
EQT 041 SSA-10			< 0.001	< 0.001	< 0.001	< 0.01				0.76
EQT 042 SSA-11			< 0.001	< 0.001	< 0.001	< 0.01				0.50
EQT 043 SSA-12			< 0.001	< 0.001	< 0.001	< 0.01				0.60
EQT 044 SSA-13			< 0.001	< 0.001	< 0.001	< 0.01				0.05
EQT 047 SSA-16	0.005	0.201	0.0068	0.0021	0.007	0.021				
EQT 048 SSA-17	0.005	0.006	0.0022	0.001	0.002	0.001				
EQT 049 SSA-18	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.01				
EQT 050 SSA-19	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.01				
EQT 053 SSA-22	1.05	1.25	0.070	0.97	1.17	0.65	14.73	17.67	59.00	3.17
EQT 054 SSA-23	0.03	0.04	0.014							3.81
EQT 055 SSA-3	1.10	1.32	4.82							1.19
EQT 056 SSA-4					< 0.001	< 0.001				21.3
EQT 057 SSA-5					< 0.001	< 0.001	< 0.001	< 0.001		1.43
EQT 058 SSA-6					< 0.001	< 0.001	< 0.001	< 0.001		0.80
EQT 059 SSA-7					< 0.001	< 0.001	< 0.001	< 0.001		
EQT 060 SSA-8					< 0.001	< 0.001	< 0.001	< 0.001		
EQT 061 SSA-9					< 0.001	< 0.001	< 0.001	< 0.001		

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### All phases

Subject Item	PM <sub>10</sub>		SO <sub>2</sub>		NOx		CO		VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr
FUG 008 SSA-2			1.03	1.24	3.03						
<b>GRP 023 SSA-1</b>			<b>2318.06</b>	<b>2772.33</b>	<b>10153.10</b>	<b>12.59</b>	<b>14.95</b>	<b>35.15</b>			
<b>GRP 024 SSA-25</b>	<b>0.69</b>	<b>0.83</b>	<b>0.07</b>	<b>5.89</b>	<b>7.00</b>	<b>0.59</b>	<b>9.05</b>	<b>10.86</b>	<b>0.91</b>	<b>7.60</b>	<b>9.12</b>

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

### Permit Phase Totals:

PM10: 5.89 tons/yr  
 SO2: 10157.38 tons/yr  
 NOx: 65.96 tons/yr  
 CO: 3.65 tons/yr  
 VOC: 0.90 tons/yr

### Emission rates Notes:

GRP 024	PM10	Tons/Year	The emissions from this alternate scenario are included in the permitted totals
GRP 024	SO2	Tons/Year	The emissions from this alternate scenario are included in the permitted totals
GRP 024	NOx	Tons/Year	The emissions from this alternate scenario are included in the permitted totals
GRP 024	CO	Tons/Year	The emissions from this alternate scenario are included in the permitted totals
GRP 024	VOC	Tons/Year	The emissions from this alternate scenario are included in the permitted totals

PM10: 5.89 tons/yr	Which Months: All Year
SO2: 10157.38 tons/yr	Which Months: All Year
NOx: 65.96 tons/yr	Which Months: All Year
CO: 3.65 tons/yr	Which Months: All Year
VOC: 0.90 tons/yr	Which Months: All Year

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247.V0

Air - Title V Regular Permit Initial

### All phases

Subject Item	Ammonia			Chlorine			Hydrogen sulfide			Sulfur Trioxide			Sulfuric acid		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
ARE 005	< 0.001	0.020	0.01												
SSA-24															
EQT 040															
SSA-1															
EQT 041															
SSA-10															
EQT 042															
SSA-11															
EQT 043															
SSA-12															
EQT 044															
SSA-13															
EQT 045															
SSA-14															
EQT 046															
SSA-15															
EQT 047															
SSA-16															
EQT 048															
SSA-17															
EQT 049															
SSA-18															
EQT 050															
SSA-19															
EQT 051															
SSA-20															
EQT 052															
SSA-21															
EQT 055															
SSA-3															
EQT 056															
SSA-4															
EQT 057															
SSA-5															
EQT 058															
SSA-6															

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### All phases

Subject Item	Total fluorides		
	Avg lb/hr	Max lb/hr	Tons/Year
ARE 005 SSA-24	< 0.001	< 0.001	< 0.01
EQT 040 SSA-1			
EQT 041 SSA-10			
EQT 042 SSA-11			
EQT 043 SSA-12			
EQT 044 SSA-13			
EQT 045 SSA-14			
EQT 046 SSA-15			
EQT 047 SSA-16			
EQT 048 SSA-17			
EQT 049 SSA-18			
EQT 050 SSA-19			
EQT 051 SSA-20			
EQT 052 SSA-21			
EQT 055 SSA-3			
EQT 056 SSA-4			
EQT 057 SSA-5			
EQT 058 SSA-6			

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 37332 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 33A7-V0

## Air - Title V Regular Permit Initial Permit Number: 2247-VU

All phases

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant  
 Activity Number: PER19960002  
 Permit Number: 2247-V0  
 Air - Title V Regular Permit Initial

### All phases

Subject Item	Total fluorides	Avg lb/hr	Max lb/hr	Tons/Year
EQT 059 SSA:7				
EQT 060 SSA:8				
EQT 061 SSA:9				
FUG 008 SSA:2				
GRP 023 SSA:1				
GRP 024 SSA:25				

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

### Permit Parameter Totals:

Ammonia: <0.01 tons/yr  
 Chlorine: 0.015 tons/yr  
 Hydrogen sulfide: 4.27 tons/yr  
 Sulfur Trioxide: 4.86 tons/yr  
 Sulfuric acid: 40.84 tons/yr  
 Total fluorides: <0.01 tons/yr

**Emission Rates Notes:**  
 GRP 024 Sulfuric acid

Tons/Year

The emissions from this alternate scenario are included in the permitted totals

Which Months: All Year

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### ARE005 SSA-24 - Miller's Pond

- 1 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5105.B, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT040 SSA-1 - Sulfuric Acid Plant Vent Stack

- 2 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: None specified
- 3 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT041 SSA-10 - East Low Iron Tank

- 4 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT042 SSA-11 - West Low Iron Tank

- 5 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT043 SSA-12 - Start-up Acid Tank

- 6 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT044 SSA-13 - Dilution Pump Tank

- 7 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT045 SSA-14 - Oleum #1

- 8 Visible emissions of Sulfur Trioxide monitored by visual inspection/determination once every shift during operation from the seal pot. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Instantaneous determination
- 9 Replace liquid contents of the seal pot with 93% concentration or less sulfuric acid, twice each week or as soon as feasible after observing sulfur trioxide breakthrough. The seal is designed as a chemical reaction control device. The 93% sulfuric acid becomes saturated with the sulfur trioxide and the concentration increases to 99%. When the liquid is fully saturated, then sulfur trioxide fumes will be observed. Visible emissions are considered an excess emission and shall be reported in accordance with 40 CFR Part 70 General Condition R. [LAC 33:III.501.C.6]
- 10 Visible emissions recordkeeping by electronic or hard copy once every shift during operation. Keep records of the dates and times that visual inspections of the seal pot occurs. Document whether visible emissions were observed. Keep records of the date and time when replacement of the liquid contents of the seal pot occurred. Keep all records on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### EQT045 SSA-14 - Oleum #1

11 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT046 SSA-15 - Oleum #2

12 Visible emissions of Sulfur Trioxide monitored by visual inspection/determination once every shift during operation from the seal pot. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Instantaneous determination  
13 Replace liquid contents of the seal pot with 93% concentration or less sulfuric acid, twice each week or as soon as feasible after observing sulfur trioxide breakthrough. The seal is designed as a chemical reaction control device. The 93% sulfuric acid becomes saturated with the sulfur trioxide and the concentration increases to 99%. When the liquid is fully saturated, then sulfur trioxide fumes will be observed. Visible emissions are considered an excess emission and shall be reported in accordance with 40 CFR Part 70 General Condition R. [LAC 33:III.501.C.6]

14 Visible emissions recordkeeping by electronic or hard copy once every shift during operation. Keep records of the dates and times that visual inspections of the seal pot occurs. Document whether visible emissions were observed. Keep records of the date and time when replacement of the liquid contents of the seal pot occurred. Keep all records on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]  
15 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT047 SSA-16 - Molten Sulfur Tank

16 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT048 SSA-17 - Molten Sulfur Day Tank

17 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT049 SSA-18 - Molten Sulfur Pit, Feed

18 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT050 SSA-19 - Molten Sulfur Pit and Truck Unloading

19 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT051 SSA-20 - Truck Unloading

20 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### EQT052 SSA-21 - Rail Unloading

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### SSA-21 - Rail Unloading

- 21 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### SSA-22 - Temporary Diesel Air Compressor

- 22 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1.101.B]

Which Months: All Year Statistical Basis: None specified

23 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33:III.1.313.C]

Which Months: All Year Statistical Basis: None specified

- 24 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1.513]

### SSA-4 - Sulfuric Acid Storage Tank #1

- 25 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### SSA-5 - Sulfuric Acid Storage Tank #2

- 26 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### SSA-6 - Sulfuric Acid Storage Tank #3

- 27 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### SSA-7 - Sulfuric Acid Storage Tank #4

- 28 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### SSA-8 - Sulfuric Acid Storage Tank #5

- 29 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### SSA-9 - 98% Pump Tank

- 30 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247.V0

Air - Title V Regular Permit Initial

### **FUG008 SSA-2 - Sulfuric Acid Plant Fugitives**

31 Emits Class III TAP only. MACT is not required. Emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 shall be included in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. (TEDI). [LAC 33:III.5107.A.2]

### **GRP022 Sulfuric Acid Plant**

- 32 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1103.]
- 33 Outdoor burning of waste material or other combustible material is prohibited. [LAC 33:III.1109.B]
- 34 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]
- 35 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.21.3.A.1-5. [LAC 33:III.2113.A]
- 36 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit license, registration, or variance. [LAC 33:III.21.9]
- 37 Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.D are prohibited. [LAC 33:III.2901.D]
- 38 If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G. [LAC 33:III.2901.F]
- 39 Particulate matter (10 microns or less) <= 5.89 tons/yr The total represents the summation of 8,560 hours of normal operation and 200 hours of Startup emissions at the higher lbs/hr rate from Alternate Operating Scenario GRP 24. [LAC 33:III.501.C.6]
- 40 Sulfur dioxide: All Year Statistical Basis: Annual maximum  
Which Months: All Year Statistical Basis: Annual maximum  
Sulfur dioxide <= 10157.38 tons/yr The total represents the summation of 8,560 hours of normal operation and 200 hours of Startup emissions at the higher lbs/hr rate from Alternate Operating Scenario GRP 24. [LAC 33:III.501.C.6]
- 41 Nitrogen oxides <= 65.96 tons/yr The total represents the summation of 8,560 hours of normal operation and 200 hours of Startup emissions at the higher lbs/hr rate from Alternate Operating Scenario GRP 24. [LAC 33:III.501.C.6]
- 42 Carbon monoxide <= 3.65 tons/yr The total represents the summation of 8,560 hours of normal operation and 200 hours of Startup emissions at the higher lbs/hr rate from Alternate Operating Scenario GRP 24. [LAC 33:III.501.C.6]
- 43 VOC: Total <= 0.90 tons/yr The total represents the summation of 8,560 hours of normal operation and 200 hours of Startup emissions at the higher lbs/hr rate from Alternate Operating Scenario GRP 24. [LAC 33:III.501.C.6]
- 44 Sulfuric acid <= 40.84 tons/yr The total represents the summation of 8,560 hours of normal operation and 200 hours of Startup emissions at the higher lbs/hr rate from Alternate Operating Scenario GRP 24. [LAC 33:III.501.C.6]
- 45 Ammonia < 0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### GRP022 Sulfuric Acid Plant

- 46 Total fluorides < 0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 47 Chlorine <= 0.015 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 48 Hydrogen sulfide <= 4.27 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 49 Sulfur Trioxide <= 4.86 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 50 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard. [LAC 33:III.5105.A.1]
- 51 Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109. [LAC 33:III.5105.A.2]
- 52 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. [LAC 33:III.5105.A.3]
- 53 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A. [LAC 33:III.5105.A.4]
- 54 Submit Annual Emissions Report (TE-D): Due annually, by the 1st of July, to the Office of Environmental Assessment, Environmental Evaluation Division in a form specified by the department. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3. [LAC 33:III.5107.A.2]
- 55 Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations" [LAC 33:III.5107.A.3]
- 56 Submit notification. Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property). [LAC 33:III.5107.B.1]
- 57 Submit notification. Due to the Office of Environmental Compliance, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III. Chapter 51. Table 51.1 or a reportable quantity (RQ) in LAC 33:1.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923. [LAC 33:III.5107.B.2]
- 58 Submit notification. Due to the Office of Environmental Compliance immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:1.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.3923. [LAC 33:III.5107.B.3]
- 59 Submit written report. Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii. [LAC 33:III.5107.B.4]
- 60 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge. [LAC 33:III.5107.B.5]

## **SPECIFIC REQUIREMENTS**

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### **GRP022 Sulfuric Acid Plant**

- 61 Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology. [LAC 33:III.5109.B.3]
- 62 Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2. [LAC 33:III.5109.B]
- 63 Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department. [LAC 33:III.5109.C]
- 64 Obtain a Louisiana Air Permit in accordance with LAC 33:III.5111.B and C and in accordance with LAC 33:III.1.I.701, before commencement of the construction of any new source. [LAC 33:III.5111.A.1]
- 65 Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D. if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source. [LAC 33:III.5111.A.2.a]
- 66 Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. [LAC 33:III.5111.A]
- 67 Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel. [LAC 33:III.5113.B.1]
- 68 Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department. [LAC 33:III.5113.B.3]
- 69 Provide emission testing facilities as specified in LAC 33:III.5113.B.4a through e. [LAC 33:III.5113.B.4]
- 70 Analyze samples and determine emissions within 30 days after each emission test has been completed. [LAC 33:III.5113.B.5]
- 71 Submit certified letter. Due to the Office of Environmental Assessment, Environmental Technology Division before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test. [LAC 33:III.5113.B.5]
- 72 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 73 Submit notification. Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test. [LAC 33:III.5113.B.7]
- 74 Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence. [LAC 33:III.5113.C.1]
- 75 Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ. [LAC 33:III.5113.C.2]
- 76 Submit performance evaluation report. Due to the Office of Environmental Assessment, Environmental Technology Division within 60 days of the monitoring system performance evaluation. [LAC 33:III.5113.C.2]
- 77 Submit notification in writing. Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system to begin. [LAC 33:III.5113.C.2]
- 78 Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems. [LAC 33:III.5113.C.3]
- 79 Evaluate the performance of continuous monitoring systems, upon request by DEQ, in accordance with the requirements and procedures contained in the applicable performance specification of 40 CFR Part 60, appendix B. [LAC 33:III.5113.C.5.a]

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant  
Activity Number: PER19960002  
Permit Number: 2247-V0  
Air - Title V Regular Permit Initial

### GRP022 Sulfuric Acid Plant

- 80 Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days. [LAC 33:III.511.3.C.5.a]
- 81 Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS. [LAC 33:III.511.3.C.5.d]
- 82 Collect and reduce all data as specified in LAC 33:III.511.3.C.5.e.i and ii, if required to install a CMS. [LAC 33:III.511.3.C.5.e]
- 83 Submit plan: Due to the Office of Environmental Assessment, Environmental Technology Division within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system. [LAC 33:III.511.3.C.5]
- 84 Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ. [LAC 33:III.511.3.C.7]
- 85 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 1st of July to the Department of Environmental Quality, Office of Environmental Services, Permits Division. Include the information in LAC 33:III.5307.A for the preceding calendar year. [LAC 33:III.5307.B]
- 86 Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert. [LAC 33:III.5609.A.1.b]
- 87 Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning. [LAC 33:III.5609.A.2.b]
- 88 Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency. [LAC 33:III.5609.A.3.b]
- 89 Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7. [LAC 33:III.5609.A]
- 90 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.A]
- 91 Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur. [LAC 33:III.5907]
- 92 Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Surveillance Division within 60 days after the information in the submitted registration is no longer accurate. [LAC 33:III.5911.C]
- 93 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Environmental Evaluation Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.91.9.A-D [LAC 33:III.91.9.D]
- 94 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 95 Submit Title V monitoring results report: Due semiannually, by March 31 st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 96 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(B)] as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 97 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]

## SPECIFIC REQUIREMENTS

AI ID: 3732 - PCS Nitrogen Fertilizer LP - Nitrate Group - Geismar Agricultural Nitrogen & Phosphate Plant

Activity Number: PER19960002

Permit Number: 2247-V0

Air - Title V Regular Permit Initial

### GRP022 Sulfuric Acid Plant

98 Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B. [40 CFR 82 Subpart F]

### GRP023 Sulfuric Acid Plant Normal Operation

99 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.110.B]

Which Months: All Year Statistical Basis: None specified

100 Sulfur dioxide <= 2000 ppmv. [LAC 33:III.1503.A]

Which Months: All Year Statistical Basis: Three-hour average

101 Acid mist <= 0.5 lb/ton of 100% H<sub>2</sub>SO<sub>4</sub>. [LAC 33:III.1503.A]

Which Months: All Year Statistical Basis: Three-hour average

102 Determine sulfur dioxide and sulfuric acid mist concentrations in stack gases using the methods in LAC 33:III.1503.D. Table 4. Use these methods for initial compliance determinations and for additional compliance determinations for those facilities not subject to continuous emission monitoring. [LAC 33:III.1503.D.1]

103 Sulfur dioxide monitored by continuous emission monitor (CEM) continuously. Ensure that the measurement system is certified according to Performance Specification 2 of 40 CFR 60, Appendix B, and quality assured by the procedures in 40 CFR 60, Appendix F. [LAC 33:III.1511.A]

Which Months: All Year Statistical Basis: None specified

104 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate compliance with the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

105 Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC

33:III.Chapter 5. [LAC 33:III.1513]

106 Submit quarterly reports of three-hour excess emissions and reports of emergency conditions, in accordance with LAC 33:1 Chapter 39. [LAC 33:III.1513]

### GRP024 Sulfuric Acid Plant Startups

107 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]

Which Months: All Year Statistical Basis: None specified

108 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33:III.1313.C]

Which Months: All Year Statistical Basis: None specified

109 Sulfur dioxide monitored by continuous emission monitor (CEM) continuously. [LAC 33:III.1511.A]

Which Months: All Year Statistical Basis: None specified

110 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate compliance with the provisions of LAC 33:III Chapter 15 and the sulfur dioxide emission limitations for this startup alternate operating scenario. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]